



July 8, 2020

Stanley L. Garnett
Brownstein Hyatt Farber Schreck, LLP
410 Seventeenth Street, Suite 2200
Denver, CO 80202

RE: Bonding – Mr. Brian Watson and WDC Holdings, LLC
Civil Action No. 1:20cv484

Dear Mr. Garnett:

You contacted me in an effort to obtain a bond for Mr. Watson to file with the court as security in lieu of placing money in an escrow account. I was provided with court documents and financial statements for Mr. Watson and WDC Holdings, LLC.

I contacted three surety companies – The Hartford, Zurich, and Philadelphia – and discussed the basics of the case and the financial information with each surety. After learning some specifics of the case, The Hartford was unwilling to consider writing the bond. Zurich and Philadelphia were both willing to consider the bond, but after further discussion, Zurich declined to pursue the opportunity. After a deeper review of the case documents and the financial information provided to us for Mr. Watson and WDC Holdings, LLC, Philadelphia suggested that perhaps there was enough value in Mr. Watson's real estate holdings to pledge those assets to a bank to secure a sufficient ILOC to post as collateral. However, because there are other investors involved in Mr. Watson's real estate ventures, he was unable to pledge those assets.

Without 100% collateral, we are unable to procure this bond on behalf of Mr. Watson and WDC Holdings, LLC.

The contents of this letter are true to the best of my recollection.

Sincerely,

Jennifer L. Clampert
Surety Account Executive

STATE OF COLORADOCOUNTY OF DENVER

} SS

On 7/8/2020 before me Nicole L. McCollamPERSONALLY APPEARED Jennifer L. Clampert

personally known to me (or proved to me on the basis of satisfactory evidence) to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

Signature

Nicole L. McCollam

Nicole L. McCollam, Notary Public

My Commission Expires: January 27, 2024

NICOLE L MCCOLLAM
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 19964001146
MY COMMISSION EXPIRES JANUARY 27, 2024

*This area for Official Notarial Seal***OPTIONAL**

Though the data below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent reattachment of this form.

CAPACITY CLAIMED BY SIGNER

- ☒ INDIVIDUAL
☐ CORPORATE OFFICER

Surety Account Executive

TITLE(S)

- ☐ PARTNER(S) ☐ LIMITED
☐ GENERAL

- ☐ ATTORNEY-IN-FACT
☐ TRUSTEE(S)
☐ GUARDIAN/CONSERVATOR
☐ OTHER _____

SIGNER IS REPRESENTING:
NAME OF PERSON(S) OR ENTITY(IES)

DESCRIPTION OF ATTACHED DOCUMENTletter

TITLE OF TYPE OF DOCUMENT

1 (excl. notary)

NUMBER OF PAGES

7/8/2020

DATE OF DOCUMENT

SIGNER(S) OTHER THAN NAMED ABOVE

ALL PURPOSE ACKNOWLEDGEMENT